## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

CHRISTOPHER JOHNSON,	§	
	§	
Plaintiff,	§	
	§	
v.	§	C.A. No. 4:19-CV-02996
	§	
XCALIBUR LOGISTICS,	§	
·	§	
Defendant.	§	(JURY TRIAL DEMANDED)

PLAINTIFF'S MOTION TO COMPEL DEFENDANT'S DISCOVERY RESPONSES AND REQUEST FOR ORAL HEARING

## **EXHIBIT F**

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

CHR	ISTOPHER JOHNSON,	S	
		S	
	Plaintiff,	S	
		S	
VS		S	C.A. No. 4:19-CV-02966
		S	
XCA	LIBUR LOGISTICS	S	
		S	
	Defendant.	S	(JURY TRIAL DEMANDED)

ORAL DEPOSITION OF JEFFREY LYNN MARONEN

March 25, 2021

(REPORTED REMOTELY)

Volume 1 of 1

Oral Deposition of JEFFREY LYNN MARONEN, produced as a witness at the instance of MS. KATRINA PATRICK, ATTORNEY FOR PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause, on March 25, 2021, from 9:53 a.m. to 12:40 p.m., before Lydia P. Battle, Certified Shorthand Reporter, RPR, in and for the State of Texas, reported by stenographic means, at 26434 Morgan Creek Lane, Katy, Fort Bend County, Texas, pursuant to the Federal Rules of Civil Procedure, the Current Emergency Order Regarding the COVID-19 State of Disaster, and the provisions stated on the record attached hereto.

D-2- 0	Page 4
Page 2	
1 INDEX 2 Page No.	1 COURT REPORTER: Today's date is March 25th,
3	2 2021. The time is approximately 9:53 a.m. This is the
Appearances 3	Oral Deposition of Jeffrey Lynn Maronen, and it is being     conducted remotely in accordance with the Current Emergency
5 Testimony of JEFFREY LYNN MARONEN	5 Order Regarding the COVID-19 State of Disaster, paragraphs
Examination by MS. PATRICK	6 2.b. and c. The witness is located at 26434 Morgan Creek
7	7 Lane, Katy, Fort Bend County, Texas. The witness has been
8 Examination by MS. ZINECKER 110	8 identified to me through their Texas Drivers license.
Further Examination by MS. PATRICK 115	9 This deposition is being taken in case
10 11 Changes and Signature 117	10 styled Christopher Johnson Vs. Xcalibur Logistics, Civil
12	11 Action 4:19-CV-02966, in the United States District Court
Reporter's Certificate	12 for the Southern District of Texas, Houston Division.
14 EXHIBITS - (No. 1 through 7)	13 My name is Lydia Battle with Coastal Reporting
Exhibit 1 State of New Mexico Uniform Incident 26	14 Service, and my CSR number is 2264. I'm administering the
16 Report 17 Exhibit 2 Xcalibur Logistics Driver Policies 41	oath and reporting the deposition remotely by stenographic
and Procedures	16 means from my residence in Harris County, Texas.
Exhibit 3 Anti-Harassment policy 46	17 At this time, would counsel please state
19	their appearances and locations for the record and also
Exhibit 4 Post-Trip Inspection DVIR 71	state the appearance of anyone else in the room with you
Exhibit 5 Driver disqualifications 78	who is also attending and stipulate to allow me to swear
Exhibit 6 Employer Responsibilities 83	in the witness. We will begin with the taking attorney.
22	22 MS. PATRICK: All right. Good morning again. 23 My name is Katrina Patrick. I am taking this deposition
Exhibit 7 Xcalibur Logistics Work Order Form 86	
24	<ul> <li>remotely from my home office and there's no one else in</li> <li>my home office.</li> </ul>
25	iny nonic office.
D 2	
Page 3	Page 5
Page 3	Page 5
1 APPEARANCES 2	1 MR. WASHINGTON: Mickey Washington, co-counsel
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APPEARANCES  ATTORNEYS FOR PLAINTIFF - Christopher Johnson  MS. KATRINA PATRICK Law Offices of Katrina Patrick 6575 West Loop South, Suite 500 Bellaire, Texas 77401 Phone: (713) 796-8218	1 MR. WASHINGTON: Mickey Washington, co-counsel 2 with Katrina Patrick. I am in my office and I'm alone. 3 MS. ZINECKER: Katie Zinecker for Defendant 4 Xcalibur Logistics. I am also in my home office, in 5 Pearland, Texas, and there's no one else in the room with
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ATTORNEYS FOR PLAINTIFF - Christopher Johnson  MS. KATRINA PATRICK Law Offices of Katrina Patrick 6575 West Loop South, Suite 500 Bellaire, Texas 77401 Phone: (713) 796-8218 Fax: (832) 390-2499 Katrina@voiceoftheemployees.com  MR. MICKEY L. WASHINGTON Mickey L. Washington & Associates, PLLC 2019 Wichita Street Houston, Texas 77004 Phone: (713) 225-1838 Fax: (713) 225-1866  ATTORNEY FOR DEFENDANT - Xcalibur Logistics MS. KATIE ZINECKER Baker & McKenzie, LLP 700 Louisiana, Suite 3000 Houston, Texas 77002 Phone: (713) 427-5083 Fax: (713) 427-5099 Katie.zinecker@bakermckenzie.com  ALSO PRESENT: Mr. Christopher Johnson	MR. WASHINGTON: Mickey Washington, co-counsel with Katrina Patrick. I am in my office and I'm alone.  MS. ZINECKER: Katie Zinecker for Defendant Xcalibur Logistics. I am also in my home office, in Pearland, Texas, and there's no one else in the room with me.  COURT REPORTER: Would counsel like to state any particular stipulations at this time?  MS. PATRICK: The only thing I would put on the record is that this deposition is being taken pursuant to the Federal Rules and that the parties have a running agreement that we will make objections to form, and that's all I can recall at this time. How about you, Ms. Zinecker?  MS. ZINECKER: Nope, that's it. We agree to those stipulations.  MS. PATRICK: All right. COURT REPORTER: Would you like the witness to read and sign, Ms. Zinecker?  MS. ZINECKER: Yes, please. (Witness sworn by court reporter.) COURT REPORTER: Counsel may proceed.  JEFFREY LYNN MARONEN,